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March 15, 2011

Ms. Andrea Needles  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: C00295527  
Reply to your February 28, 2011 correspondence concerning CU-PVF's  
September Monthly Report covering August 1, 2010 – August 31, 2010

Dear Ms. Needles:

I write in reply to your letter dated February 28, 2011, to Kevin Allen, Treasurer of Citizens United Political Victory Fund ("CU-PVF"), requesting additional information regarding CU-PVF's September 2010 Monthly Report, which covers the period August 1, 2010 through August 31, 2010. More specifically, you state that the report is missing contributor identification information for one or more of the contributions disclosed in Schedule A. But while your letter describes the information that is required to be disclosed, it does not identify any particular information that is missing with respect to any of the contributions disclosed in the report. Nevertheless, you request that CU-PVF either (a) file an amended report providing the unidentified missing information or (b) provide a detailed description of CU-PVF's procedures for complying with the Commission's "best efforts" requirements for obtaining the contributor identifier information required to be disclosed.

I have reviewed Schedule A of the Monthly Report and note that as follows: (1) there are contributions from seven individual donors in which the contributor's first name is listed as an initial, (2) in one instance a contributor's employer is listed as the letter "S" and in several instances "Information Requested" is listed as the employer/occupation of a contributor. CU-PVF is in the process of reviewing its records to determine if it has more complete identity information for any of those contributors. If more complete information is available, CU-PVF will file an amended report providing that information.

In the meantime, CU-PVF's treasurer believes that the procedures CU-PVF has established for obtaining and disclosing the identity of its contributors fully complies with the Commission's "best efforts" requirements. Those procedures are as follows:

First, a request for accurate and complete identification is made at the time of the initial solicitation to a prospective contributor. For written solicitations (e.g.

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